

# SEPPINNI LLP

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July 28, 2022

## VIA ECF

The Honorable Paul A. Engelmayer, U.S.D.J.  
United States District Court  
Southern District of New York  
Thurgood Marshall  
40 Foley Square  
New York, NY 10007

### **Re: Dawnn Karen Mahulawde v. Fashion Institute of Technology, et al.**

*Civil Action No. 1:21-cv-03878-PAE*

Dear Honorable Judge Engelmayer,

I represent Plaintiff Dawnn Karen Mahulawde as of July 19, 2022, in the above-referenced matter and am writing to request a 90-day extension of discovery deadlines from August 25, 2022, to November 23, 2022.

On May 12, 2022, the Parties filed the first discovery extension request in this case and your Honor granted their request. On May 26, 2022, Plaintiff's previous counsel filed a request that your Honor denied because at filing there was "a full three months left to complete discovery . . ." Dkt. No. 30 at 2. Circumstances have changed since the previous counsel's May 26, 2022, request.

I have recently learned that Ms. Mahulawde is experiencing a family emergency that impedes her availability to prepare for and schedule her deposition in the coming weeks.

On July 19, 2022, with roughly a month until the close of discovery, I filed a notice of appearance and a notice of substitution of counsel in this matter (Dkt. Nos. 32, 33). Late on July 22, 2022, I received Defendants' discovery productions, which are voluminous and currently under review. Right away, the parties attempted to schedule depositions in compliance with the current discovery deadlines. Plaintiff's counsel has agreed to depose one Defendant on August 15, 2022, but awaits receipt of the remaining Defendants' (and other FIT employee witnesses') availability from their counsel.

Due to Defendants' limited schedule, Plaintiff's recent family emergency, and my upcoming immovable professional and personal conflicts on the three dates proposed for Ms. Mahulawde's deposition, the Parties cannot conclude fact discovery before August 25, 2022. An additional 90 days would enable Plaintiff to conduct adequate document review, allow both

parties to schedule necessary depositions, and release some of the pressure on Ms. Mahulawde during her family emergency.

For these reasons, Plaintiff requests a 90-day extension of the discovery deadlines in the May 13, 2022, Order (Dkt. No 24). The deadline sought to be extended is August 25, 2022, and the proposed extended deadline is November 23, 2022.

Thank you for your consideration of this unopposed request.

Regards,

/s/ Shane Seppinni  
Shane Seppinni

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Granted. However, the parties should not expect any further extensions absent extraordinary circumstances. SO ORDERED.

Paul A. Engelmayer  
PAUL A. ENGELMAYER  
United States District Judge

July 29, 2022